

The United States of America, through the United States Attorney, District of Wyoming, and Assistant United States Attorney Mark A. Klaassen, and hereby move this Court for leave to amend its complaint in intervention pursuant to Fed. R. Civ. P. 15(a)(2). In support thereof, the undersigned states as follows:

1. Plaintiff filed its original complaint in intervention on October 28, 2013.
2. The United States filed a first amended complaint in intervention on December 13, 2013, to correct the name of the Defendant in this matter.
3. The United States inadvertently failed to include a motion for leave to amend this pleading, as required by Fed. R. Civ. P. 15 (a)(2), and is therefore filing this motion to correct that error.
4. The United States has conferred with counsel for Defendant, and the opposing party has no objection to this motion.

WHEREFORE, the United States request that the Court grant it leave to amend its complaint in intervention, thereby making the amended pleading filed December 13, 2013, the operative complaint.

DATED this 13th day of January, 2014.

Respectfully submitted,

CHRISTOPHER A. CROFTS  
United States Attorney

By: /s/ Mark A. Klaassen  
MARK A. KLAASSEN  
Assistant United States Attorney

C. LEVI MARTIN  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 13, 2014, I served a copy of the foregoing **UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT** to all parties via electronic filing notice, and by mail to:

MICHAEL A. LABAZZO  
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P.O. Box 2016  
Cody, WY 82414  
On behalf of the Defendant

/s/ Vaughna Warburton  
VAUGHNA WARBURTON  
United States Attorney's Office